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9 *Attorney for Plaintiff Tiffany Yip, et al*

10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 Tiffany Yip, et al,

14 Plaintiff,

15 v.

16 Bank of America, N.A.,

17 Defendant.

Case No.: 2:21-cv-01254-RFB-EJY

**Stipulation for an extension of time  
for Amended Complaint and  
briefing schedule for Defendant's  
motion to dismiss**

**(First request)**

18 Tiffany Yip, et al ("Plaintiff") and Bank of America, N.A. ("Defendant  
19 and together with Plaintiff as the "parties"), by and through their respective  
20 counsel, hereby submit this stipulation for an extension of time for Plaintiffs  
21 to file an Amended Complaint to add new parties and better plead the  
22 allegations in lieu of responding to Defendant's motion to dismiss (ECF No.  
23 11), and for Defendant to file a motion to dismiss Plaintiffs' Amended  
24 Complaint. This is the first request for an extension of this deadline.

25 The extension is sought because of the large amount of parties in this  
26 case, and the complex nature of the claims in this case, that requires additional  
27 time to meaningfully research and brief the issues raised.

1 In addition, the additional time will help accommodate counsels'  
2 coordination with counsel in other related pending cases in California.

3 The parties therefore stipulate as follows:

4 Plaintiffs shall file an opposition to Defendant's motion, or an amended  
5 complaint, on or before January 14, 2022.

6 Defendant's responsive pleading shall be due on or before March 3,  
7 2022. Plaintiffs' opposition shall be due on or before April 7, 2022, and  
8 Defendant's reply shall be due on or before May 5, 2022.

9 IT IS SO STIPULATED.

10 Dated: November 30, 2021.

11 **KIND LAW**

12 /s/ Michael Kind  
13 Michael Kind, Esq.  
14 8860 South Maryland Parkway, Suite 106  
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16 *Attorney for Plaintiff Tiffany Yip, et al*

17 **GOODWIN PROCTER LLP**

18 /s/ Yvonne Chan  
19 Yvonne Chan, Esq.  
20 100 Northern Avenue  
21 Boston, MA 02210  
22 *Counsel for Bank of America, N.A.*

23 IT IS SO ORDERED:

24   
25 RICHARD E. BOULWARE, II  
26 **United States District Court**  
27

DATED this 7th day of December, 2021.